

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JAMES A. WILSON, et..al.,
on Behalf of Themselves And all
Others Similarly Situated at the
Sussex Correctional Institution,
Georgetown, Delaware.

Plaintiffs

v.

STANLEY TAYLOR, RICK
KEARNEY, Individually and
in Their Official Capacity,
and DELAWARE DEPARTMENT
OF CORRECTIONS.

CLASS ACTION

AMENDED COMPLAINT

Civil Action No. 05-399-JJF

MOTION FOR LEAVE TO FILE AN AMENDED COMPLAINT

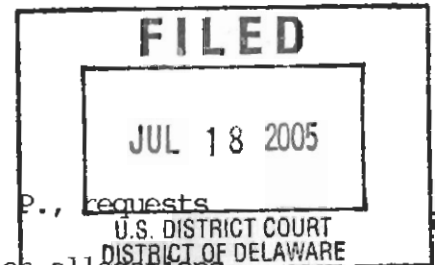
Plaintiffs, pursuant to Rules 15(a) and 19(a), Fed. R. Civ. P., requests
leave to file an amended complaint adding a party and class action allegations.

1. The plaintiffs in the original complaint inadvertently failed to
caption "Class Action" on the complaint. However, plaintiffs did state class
action in the Prayer For Relief (b). Class Action caption has been added to complaint.

2. Plaintiffs has amended statement of claim to add paragraphs 12 through
25 with class action allegations.

3. Since the filing of the complaint the plaintiffs has determined that
the Delaware Department of Corrections should be added as an Defendant.

4. This Court should grant leave freely to amend a complaint. Foman v.
Davis, 371 U.S. 178, 182, 83 S.Ct. 227 (1962).

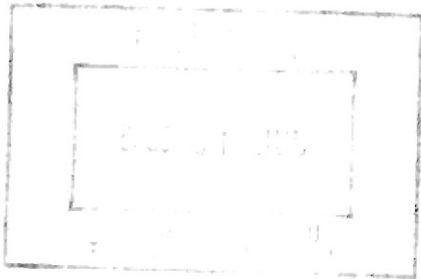


Respectfully submitted

James A. Wilson
James A. Wilson, et. al

DATED: 7/14/05

ORIGINAL



IM: JAMES WILSON BLDG. med. it / east
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